

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BRANDON COOPER and ALEXANDER LAWRIE,

Plaintiffs,

-against-

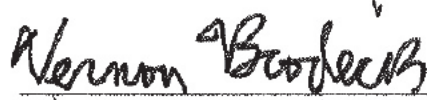
THE OFFICE OF THE COMMISSIONER OF  
BASEBALL d/b/a MAJOR LEAGUE BASEBALL,  
and PDL BLUE, INC.,

Defendants.

Civil Case No.: 24-cv-3118

**STIPULATION ALLOWING  
PLAINTIFFS TO FILE A  
SECOND AMENDED  
COMPLAINT**

**SO ORDERED: 11/6/2024**



HON. VERNON S. BRODERICK  
UNITED STATES DISTRICT JUDGE

**WHEREAS**, on October 8, 2024, Plaintiff Brandon Cooper (“Plaintiff”) and Plaintiff Alexander Lawrie filed an Amended Complaint against The Office of the Commissioner of Baseball d/b/a Major League Baseball and PDL Blue Inc. (“Defendants”) alleging a hostile work environment and wrongful termination because of their sexual orientation and/or gender and/or retaliation in violation under the New York State Human Rights and New York City Human Rights Law;

**WHEREAS**, the EEOC issued Plaintiff Lawrie a right to sue letter on November 4, 2024;

**WHEREAS**, Plaintiffs seek to file a second amended complaint that, includes allegations concerning the EEOC’s issuance of a notice of right to sue to Plaintiff Lawrie;

**WHEREAS**, a copy of Plaintiffs’ proposed Amended Second Complaint is attached hereto as **Exhibit A** [\[Doc. 24-1\]](#)

**IT IS HEREBY STIPULATED AND AGREED**, between Plaintiffs and Defendants, by and through their respective counsel, that:


1. Pursuant to Federal Rule 15(a)(2), Plaintiffs may file a second amended complaint that is attached hereto as **Exhibit A**;

2. Defendants' deadline to answer, move, or otherwise respond shall be forty-five (45) days after the Second Amended Complaint is filed; and

3. In so stipulating, Defendants have not waived any defenses they may raise in response to the Second Amended Complaint.

Dated: November 5, 2024

**JOSEPH & NORINSBERG, LLC**

  
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CAITLIN DUFFY  
Attorneys for Plaintiff

Dated: November 5, 2024

**EPSTEIN BECKER & GREEN, P.C.**

/s/ Shira M. Blank  
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SHIRA M. BLANK  
Attorneys for Defendants